

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

**ELIZABETH PETERSON,
AMANDA CARLTON,
REBECCA HIRSCH, MICHELE
O'DELL, and PRASANNA
RAMAKRISHNAN**, individually and
on behalf of all others similarly
situated,

Plaintiffs,

v.

**BSH HOME APPLIANCES
CORPORATION d/b/a BOSCH**,

Defendant.

Case No. 2:23-cv-00543-RAJ

JOINT SETTLEMENT STATUS REPORT

Pursuant to this Court's MINUTE ORDER, dated August 2, 2023, the Parties submit this Settlement Status Report and show the Court as follows.

In their previous Joint Settlement Status Report to the Court (Dkt. No. 14), the Parties outlined the history of settlement discussions and the critical terms of the Settlement Agreement to which the Parties had already negotiated. At that point, the Parties had already exchanged several rounds of the draft Settlement Agreement, negotiating several components including what will be required for proof of purchase, funding of the Settlement Fund, and other details necessary to finalize the agreement. All materials terms have been agreed to.

Since the last Joint Settlement Status Report, the Parties have worked diligently to finalize the remaining details of the Settlement Agreement. The Parties have exchanged additional drafts of the Settlement Agreement and have met and conferred over resolving the last outstanding issues

that remain between the Parties, including a lengthy conference on September 21, 2023, to reach a final agreement on certain language (e.g. claims period definitions, administration of the extended service period, etc.). The Parties believe that they have reached an agreement on these last remaining issues, and that all that remains is administrative proofing and finalization of exhibits.

Although the Parties had anticipated the filing of the Motion for Preliminary Approval by today's date, there are just a few outstanding items in the Settlement Agreement that the Parties believe are resolved and upon finalizing exhibits, can be signed. Accordingly, the Parties anticipate that the Motion for Preliminary Approval can be filed by October 20, 2023.

DATED: September 22, 2023

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN PLLC**

By: /s/ Harper T. Segui
Harper T. Segui*
825 Lowcountry Blvd., Suite 101
Mount Pleasant, SC 29464
T: 919-600-5000
hsegui@milberg.com

Andrew A. Lemmon (#53034)
16212 Reitan Road NE
Bainbridge Island, WA 98110
T: 985-783-6789
alemmon@milberg.com

Rachel Soffin*
800 S. Gay Street, Suite 1100
Knoxville, TN 37929
T: 865-247-0080
F: 865-522-0049
rsoffin@milberg.com

Erin Ruben**
900 W. Morgan St.
Raleigh, NC 27603
T: 865-247-0080
F: 865-522-0049
eruben@milberg.com

Thomas A. Pacheco*
900 W. Morgan St.
Raleigh, NC 27603
T: 212-946-9305
F: 865-522-0049
tpacheco@milberg.com

*Admitted *pro hac vice*
**Motion to be admitted *pro hac vice*
forthcoming
Attorneys for Plaintiffs

DATED: September 22, 2023

PERKINS COIE LLP

/s/ Christopher M. Ledford

Christopher M. Ledford
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
CLedford@perkinscoie.com

M. Ray Hartman III *
11452 El Camino Real, Suite 300
San Diego, CA 92130-2080
RHartman@perkinscoie.com

Jasmine W. Wetherell *
1888 Century Park E., Suite 1700
Los Angeles, CA 90067-1721
JWetherell@perkinscoie.com

*Motion to be admitted *pro hac vice*
forthcoming

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rule of Civil Procedure.

By: /s/ Harper T. Segui

Harper T. Segui*

Milberg Coleman Bryson

Phillips Grossman LLC

825 Lowcountry Blvd., Suite 101

Mount Pleasant, SC 29464

T: 919-600-5000

hsegui@milberg.com